

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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AVERIL C. MORRISON, DELISA WILLIAMS, :
JANENNE GONZALEZ, DELROY DANVERS, :
GARFIELD DANVERS, Individually and on :
behalf of all others similarly situated, :

Civil Action No. 1:12-cv-00301-FB-RER

Plaintiffs,

-against-

STIPULATION

INTERNATIONAL UNION OF OPERATING :
ENGINEERS LOCAL 14-14B, AFL-CIO, BAY :
CRANE SERVICE INC., DCM ERECTORS, :
INC., DRAGADOS CONSTRUCTION USA, :
INC., DRAGADOS USA, INC., EL SOL :
CONTRACTING AND CONSTRUCTION :
CORPORATION, FOREST CITY :
COMMERCIAL CONSTRUCTION CO., INC., :
FOREST CITY RATNER COMPANIES, LLC, :
GOTHAM CONSTRUCTION COMPANY, LLC, :
HALMAR CONSTRUCTION CORP., JUDLAU :
CONTRACTING, INC., JUDLAU :
ENTERPRISES, LLC, LEND LEASE (US) :
CONSTRUCTION LMB INC., MONADNOCK :
CONSTRUCTION, INC., SHIAVONE :
CONSTRUCTION CO. LLC, SKANSKA USA :
INC., SKANSKA INC., SOLERA :
CONSTRUCTION INC., SORBARA :
CONSTRUCTION CORP., TISHMAN :
CONSTRUCTION CORPORATION OF :
MANHATTAN, TISHMAN CONSTRUCTION :
CORPORATION OF NEW YORK, TISHMAN :
CONSTRUCTION CORPORATION, TURNER :
CONSTRUCTION COMPANY, YONKERS :
CONTRACTING COMPANY, INC., :

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and between the parties,

through their respective counsel, and subject to the approval of the Court, that:

1. Counsel for both parties have spoken numerous times and are actively pursuing settlement. As such, the parties mutually agree that additional time to confer would be beneficial and aid in coming to an agreement in order to avoid the possibly unnecessary cost of answering or otherwise moving in response to the Amended Complaint

2. The parties hereby stipulate and respectfully request the Defendants' time to answer, object or otherwise respond to the Amended Complaint shall be extended two weeks to October 12, 2012. This stipulation is without waiver or prejudice to any defenses available to Defendants which are hereby expressly preserved.

3. Signatures by facsimile shall be acceptable for purposes of this stipulation.

Dated: September __, 2012

Respectfully submitted,

LAW OFFICE OF MICHAEL G. O'NEILL

By: 

Michael G. O'Neill, Esq.

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Attorneys for Plaintiffs

Respectfully submitted,

PROSKAUER ROSE LLP

By: 

Jeremy M. Brown

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Attorneys for Defendants

*Forest City Ratner Companies, LLC
Forest City Commercial Construction Co.,
Inc. and Forest City Enterprises, Inc.*

SO ORDERED this ____ day of
_____, 2012.

Honorable Frederic Block
United States District Judge